

# MEMORANDUM

## IDAHO DEPARTMENT OF LABOR



**DATE:** August 5, 2003

**WIAB 01-03**

**TO:** Local Workforce Investment Areas

**FROM:** Cheryl Brush, Chief, Workforce Systems

**SUBJECT:** First Quarter Monitoring: The Participant File Review

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As you were made aware in WIA Bulletin (WIAB) #01-02, during the first quarter of each program year, the Grants Management Unit reviews participant files for compliance with the Act, regulations, rules, policies, local plans and contracts. Within the next few weeks, your grants officer will be contacting you to request selected participant files for review. To assist in the success of the review process, please send complete files that include all participant information that you have not previously sent to the WIA Program Technical Services Unit.

For your information, the updated Participant File Review tool has been attached to this memorandum.

Attachments

## WIA SERVICE PROVIDER REVIEW

Program Year: \_\_\_\_\_

### Participant File Review

Provider Name:	Cost Center Number:
WIA Agreement Number:	Reviewer _____
Date(s) of Review:	Name(s): _____

### PRIOR REVIEW

Describe any related findings or improvements identified during the last Participant File Review, On-Site Review and/or Financial/Reports/Misc. Review that require attention during this Participant File Review.

Review Date \_\_\_\_\_

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Review Codes:    1: Finding    2: Needs Improvement    3: None    4: Exemplary

### NEPOTISM

1.   ☐ Finding    ☐ Needs Improvement    ☐ None    ☐ Exemplary

Is there any evidence of violation of the nepotism standards? *Reviewer Note: In addition to the prohibition against a site hiring a relative into a training position, the subrecipient may not hire a person in any position funded under WIA, if a member of that person's immediate family is engaged in any administrative or support function in the hiring and/or funding organization.*

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## ELIGIBILITY REVIEW

2. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Review the Adult Program priority guidelines in the Area's 5-Year Plan. Is the majority of Adult Program participants low income? Is participant income verified or documented in accordance with the Plan? *Reviewer Note: 1) WIA Section 134(d)(4)(E) states that priority shall be given to recipients of public assistance and other low-income individuals for Intensive services and Training services and that the appropriate local board and Governor shall direct the one-stop operators in the local area with regard to making determinations related to such priority. 2) If the Area Plan does not specify how the provider will ensure priority to low income individuals, have the Service Provider describe the processes they use to ensure priority to low-income adults.*

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3. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Does the review indicate compliance with processes established for determination and documentation of all eligibility requirements for each program? *Review Note: 1) General eligibility is the age, selective service, citizenship/eligibility to work and residency requirements. 2) Youth Program economic eligibility is the low income criteria, with a 5% Window defined in the Area 5 Year Plan. 3) Additional Dislocated Worker Program eligibility criteria are the 5 eligibility groups specific to the Dislocated Worker Program, i.e. recently dislocated, displaced homemaker, etcetera.*

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4. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

For Adult and Dislocated Worker Program participants, does the review indicate compliance with processes established for determination and documentation of self-sufficiency to receive Intensive services? *Reviewer Note: 1) The Workforce Investment Act requires the provision of services beyond the core level to those Adult and Dislocated Worker Program participants who are unemployed, or who are employed and unable to meet the criteria for self-sufficiency, and are unable to obtain employment through core services. 2) Self-sufficiency is defined as "Family income does not exceed 200% of the HHS Poverty Guidelines or, if a reemployed Dislocated Worker, is employed in a permanent position that pays less than 90% of the qualifying layoff wage." 3) Form WIA-74-C should be in the files.*

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5. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Does the review indicate compliance with processes established for determination and documentation of eligibility for Training services?

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6. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Does the subrecipient maintain documentation for the required referral of eligible applicants when applicable? Is the mechanism designed by the WIB in use?

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## ASSESSMENT

7. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

For Youth participants, does the review indicate completion of the Youth Training Plan?

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8. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

For Youth participants, does the review include an assessment that supports the need for mentoring and, if so, is the appropriate parental consent form used? Is participant progress documented in case notes?

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9. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

For Adult and Dislocated Worker participants, does the review reflect the appropriate level of Assessment within the tiers? Is the required Employment Plan used in delivery of Intensive and/or Training services? *Reviewer Note: The WIA-130 series Adult Employment Plan and Youth Training Plan forms, or a like assessment form, must be used.*

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10. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Is the training goal directly linked to employment opportunities in the local area or in another area to which the participant is willing to relocate? Was labor market information provided for the participant employment goal?

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11. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Are changes/modifications to training or employment goals documented in the Plan? Is the new goal linked to an employment goal for Youth or, for Adult and Dislocated Worker programs, to employment opportunities in the local area or in another area to which the participant is willing to relocate? Was labor market information provided for the new goal?

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12. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Are conditions of employment/training appropriate and reasonable in light of factors such as the type of work/training, geographic area and other factors shown in the participant assessment? *Reviewer Note: This information is to be gained during participant file review and participant interviews.*

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## PROGRAM REQUIREMENTS

13. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Does the review indicate compliance with the Regional guidelines for establishment and attainment of Youth goals? *Reviewer Note: The Participant File Review Check List contains specific questions in this area and may be referenced here as the data source.*

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14. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

For Youth, has the provider made available the following ten required elements of the WIA Youth programs? Who provides these services?

1. *Tutoring, study skills training and instruction leading to completion of secondary school, including dropout prevention strategies;*
  2. *Alternative secondary school services, as appropriate;*
  3. *Summer employment opportunities that are directly linked to academic and occupational learning;*
  4. *Paid and unpaid work experiences, including internships and job shadowing, as appropriate;*
  5. *Occupational skill training, as appropriate;*
  6. *Leadership development opportunities, which may include community service and peer-centered activities, as appropriate;*
  7. *Supportive services;*
  8. *Adult mentoring for the period of participation and a subsequent period, for a total of not less than 12 months;*
  9. *Follow-up services for not less than 12 months after the completion of participation, as appropriate;*
  10. *Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referral, as appropriate.*
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15. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

For Adult and Dislocated Worker participants, does the review reflect adherence to the WIA required tiered delivery of services? *Reviewer Note: WIA requires that to meet individual needs, participants receive the lowest level of service (Core) first and move to the next level (Intensive) if their needs cannot be met and on to the third level (Training), if appropriate. Case notes should reflect the tiered continuum of service.*

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16. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Does the review reflect the Subrecipient's requirement to provide for coordination of Pell Grant and other training funds via methods outlined in the agreement and WIA TAGs? *Reviewer Note: The WIA 42, Student Financial Aid Transmittal form , is recommended for coordination purposes.*

17. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Does the subrecipient consider and discuss with female **and male** clients the possibility of nontraditional jobs for enrollees if assessment indicates a nontraditional interest area ?

18. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

For Adult and Dislocated Worker Program participants, is the training provider on the Eligible Training Provider List? *Reviewer note: The ITA (Code C) is not allowed for Intensive Service or the Youth Program (Code A).*

19. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Does the provider assure participant choice in the selection of training providers?

20. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

When utilizing OJTs, does the file review indicate compliance with the region's method for determining the period of the OJT? Are the OJT Contract and the Training Task Outline used? Does the Training Task Outline reflect adequately the duties, required training and the hours necessary for the training?

21. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Does the participant file sample indicate that payments made directly to participants are for hours worked, or, as specified per agreement, for bonuses/incentives or needs-related payments?  
*Reviewer Note: Per contract, participant payments may be paid as authorized; any other participant payments or any of the above not allowable by contract must be investigated further.*

22. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

If supportive services have been provided, were they provided within the guidelines described in the TAG/service provider agreement?

23. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Are required forms properly completed and retained by the service provider? *Reviewer Note: Forms requiring completion and retention are listed at the end of each major component section of the WIA TAG.*



## FOLLOW-UP

Adults and Dislocated Workers who are placed in unsubsidized employment must receive follow-up services for a minimum of 12 months after the first date of employment. All youth participants must receive some form of follow-up for a minimum of 12 months.

24. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Are follow-up services being provided for the required period, according to local policies? *Reviewer Note: Each region has specific requirements for follow-up as stated below.*

*Region I. Funds may be expended "to remain employed" only and requires minimum contacts at 3,6 and 12 months.*

*Region II. Requires follow-up, no minimum number of contacts specified.*

*Region III. Services are provided during the 12 months following exit. They may include counseling, coaching (Intensive Services) and/or Core Services in locating other employment should a job or employer be found not to be suitable.*

*Region IV. Requires 12 months of follow-up with services based on participant needs.*

*Region V. One Stop Operator will determine the supported activities and maximum amounts during follow-up, and will define what constitutes a contact. The WIB has only one requirement: a minimum of 3 contacts during the 12 month period.*

*Region VI. Funds may be expended "to remain employed" only.*

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25. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Do files indicate that appropriate services, including supportive services, were provided as necessary during follow-up?

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26. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

If Training services or work experience, job shadowing or internship were provided during this period, were participants reenrolled in WIA? *Review Note: Though Core services and many Intensive services may be provided during follow-up, provision of Intensive services that require ongoing WIA payment support or any Training service requires reenrollment into WIA.*

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27. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Have program participants been informed of the Follow-up contacts that will be made during the 12 months after exit? Have they also been informed of the customer satisfaction survey which will occur within 60 days after exit?

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**EO/NONDISCRIMINATION**

28. ☐ Noncompliance Issue ☐ Concern ☐ None ☐ Exemplary

Has notice been given to participants of the recipient's obligation to operate in a nondiscriminatory manner? *Reviewer Note: The signature sheet of the WIA 10 contains the notice and should be in the participant file. If the review indicates that discrimination may have occurred in the provision of services, the review should be forwarded to Roy Valdez, WIA EO Officer, for further investigation.*

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29. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

For participants with disabilities, does the participant file review reflect that services are being provided in the most integrated setting—i.e., reasonable accommodation—reasonable modification; Are auxiliary aids, signage, TTY/TTD being used so that communication is as effective as with others?

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30. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

If the participant file review indicates that a participant has alleged discrimination, was a complaint form provided; was the complaint process followed? *Reviewer Note: If the review indicates that discrimination may have occurred, and the process has not been followed, the review should be forwarded to Roy Valdez, WIA EO Officer, for further investigation.*

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